

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY  
INC., a nonprofit organization on  
behalf of members residing in Georgia;  
SIXTH DISTRICT OF THE  
AFRICAN METHODIST  
EPISCOPAL CHURCH, a Georgia  
nonprofit organization; ERIC T.  
WOODS; KATIE BAILEY GLENN;  
PHIL BROWN; JANICE STEWART,

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State  
of Georgia.

*Defendant.*

**Case No. 1:21-CV-05337-SCJ**

**DECLARATION OF EDWARD WILLIAMS, ESQ.  
IN SUPPORT OF PLAINTIFFS' RENEWED MOTION  
FOR A PRELIMINARY INJUNCTION**

I, Edward Williams, declare as follows:

1. I am an attorney at the law firm Wilmer Cutler Pickering Hale and Dorr, LLP, counsel for Plaintiffs ALPHA PHI ALPHA FRATERNITY, INC., SIXTH DISTRICT OF THE AFRICAN METHODIST EPISCOPAL CHURCH, ERIC T.

WOODS, KATIE BAILEY GLENN, PHIL BROWN, and JANICE STEWART (collectively, “Plaintiffs”) in the above-captioned matter.

2. I submit this declaration in support of Plaintiffs’ Renewed Motion for Preliminary Injunction.

3. Attached hereto as Exhibit A is a true and correct copy of the Report of William S. Cooper and supporting exhibits.

4. Attached hereto as Exhibit B is a true and correct copy of the Report of Dr. Lisa Handley and supporting appendices.

5. Attached hereto as Exhibit C is a true and correct copy of the Report of Dr. Adrienne Jones and supporting exhibits.

6. Attached hereto as Exhibit D is a true and correct copy of the Report of Dr. Traci Burch.

7. Attached hereto as Exhibit E is a true and correct copy of the Report of Dr. Jason Morgan Ward.

8. Attached hereto as Exhibit F is a true and correct copy of the Declaration of Katie Bailey Glenn.

9. Attached hereto as Exhibit G is a true and correct copy of the Declaration of Phil S. Brown.

10. Attached hereto as Exhibit H is a true and correct copy of the Declaration of Janice Stewart.

11. Attached hereto as Exhibit I is a true and correct copy of the Declaration of Eric Woods.

12. Attached hereto as Exhibit J is a true and correct copy of the Declaration of Sherman Lofton, Jr. on behalf of Alpha Phi Alpha Fraternity Inc.

13. Attached hereto as Exhibit K is a true and correct copy of the Declaration of Bishop Reginald T. Jackson on behalf of the Sixth District of the African Methodist Episcopal Church.

14. Attached hereto as Exhibit L is a true and correct copy of the 2021-2022 Guidelines for the House Legislative and Congressional Reapportionment Committee.

15. Attached hereto as Exhibit M is a true and correct copy of the 2021 Guidelines for the Senate Redistricting Committee.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Edward Williams  
Edward Williams

Executed on January 13, 2022 in Washington, D.C.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Rahul Garabadu